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1999 DEC 20 A 8:28

December 16, 1999

Attn: Angel L. Williamson, Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00300921

Reference: Mid-Year Report (1/1/99-6/30/99)

This memorandum is in response to your letter dated December 1, 1999 that was submitted due to concerns prompted by your review of the Mid-Year Report (1/1/99-6/30/99):

Corporate Contribution

It was brought to our attention that we reported a corporate contribution from Calver Corporation for the amount of \$5,000 on 4/7/99. Based on this concern, we reviewed our financial records noting that it appears that this contribution was mistakenly deposited into our federal account. As a result, we have transferred this amount to our non-federal account which is not used to influence federal elections. In addition, we will notify Calver Corporation of this action. We will work diligently to ensure this incident does occur in the future. See attached copy of check representing transfer to our non-federal account. See attachment 1.

Corporate Transfer-Out

This represents the transfer-out of a corporate contribution that was received on 10/28/98 and included on Line 11(a) of the 30-Day Post-General Report (10/1/98-11/23/98). An amendment was submitted to your agency documenting the corrective action taken for this receipt dated 3/26/99. This corrective action was based on an inquiry that we received from your agency dated 3/11/99. The transfer-out is dated as 3/25/99 on the Mid-Year Report (1/1/99-6/30/99) and the check for this transfer-out is dated as 3/18/99.

"Best Efforts"

In response to your concerns regarding our "best efforts" to obtain the full name, mailing address, occupation and name of employer for contributors who exceed the \$200 threshold, the following procedures are performed:

• **Clear and Conspicuous Request**

All solicitations include an accurate and clear statement of the law's requirements for the collection and reporting of the above contributor information.

• **Follow-Up Requests Within 30 Days**

On a monthly basis, a report is generated that list all contributors who have contributed over \$200 at the completion of the month. This report is then reviewed and any contributors identified who did not provide the FEC required information are identified. A written follow-up request is then sent to the contributors who provided the incomplete information. Due to the recent increase in the number of contributors who cause this situation, we are currently exploring options to automate this process because the current process is quite manual. All follow-up requests to contributors of more than \$200 include the following wording: